

THE URBAN LAW FIRM

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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION
TRUST FOR SOUTHERN NEVADA;
TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
HEALTH BENEFITS FUND; TRUSTEES
OF THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

vs.

PEGASUS MARBLE, INC., a Nevada
corporation; and GAGIK ZARGARYAN, an
individual,

Defendants.

CASE NO: 2:19-cv-00362-GMN-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
PLAINTIFFS TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS
AND MOTION TO STAY**

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1 Plaintiffs TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS
2 LOCAL 13 DEFINED CONTRIBUTION PENSION TRUST FOR SOUTHERN NEVADA;
3 TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13 HEALTH
4 BENEFITS FUND; TRUSTEES OF THE BRICKLAYERS & ALLIED CRAFTWORKERS
5 LOCAL 13 VACATION FUND; BRICKLAYERS & ALLIED CRAFTWORKERS LOCAL 13
6 NEVADA; TRUSTEES OF THE BRICKLAYERS & TROWEL TRADES INTERNATIONAL
7 PENSION FUND; TRUSTEES OF THE BRICKLAYERS & TROWEL TRADES
8 INTERNATIONAL HEALTH FUND; and TRUSTEES OF THE INTERNATIONAL
9 MASONRY INSTITUTE (hereinafter referred to collectively as “Plaintiffs”), by and through their
10 counsel of record, The Urban Law Firm, and PEGASUS MARBLE, INC. and GAGIK
11 ZARGARYAN (hereinafter referred to collectively as “Defendants”), by and through their counsel
12 of record, Law Office of Daniel Marks, hereby stipulate to extend the time for Plaintiffs to respond
13 to Defendants’ Motion to Dismiss Third Claim and Motion to Stay through the date of May 28,
14 2019, which is a 20 day extension of the current deadline.

15 Defendants’ Motion to Dismiss Third Claim and Motion to Stay were filed on April 24,
16 2019. ECF Nos. 11-12. The Plaintiffs’ response is currently due May 8, 2019.

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18 Due to travel schedule of Plaintiffs’ counsel and prior scheduled court hearings in another
19 state, Plaintiffs’ counsel needs an extension of time—until May 28, 2019—to prepare the
20 Plaintiffs’ response to Defendants’ Motion to Dismiss Third Claim and Motion to Stay. Plaintiffs’
21 counsel has conferred with Defendants’ counsel and Defendants’ counsel has stated that he agrees
22 to the extension request.

23 This request is made in good faith and is not made for any improper purpose or to delay
24 these proceedings.

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2 Dated: May 6, 2019

THE URBAN LAW FIRM

3 By: /s/ Nathan R. Ring
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Counsel for Plaintiffs

7 Dated: May 6, 2019


LAW OFFICE OF DANIEL MARKS

8 By: /s/ Adam Levine
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15 **ORDER**

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17 **IT IS HEREBY ORDERED** that the above Stipulation to Extend Time, (ECF No. 13), is **GRANTED**.

18 DATED this 7 day of May, 2019.

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22 Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT
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